

UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND

UNITED STATES OF AMERICA

v.

ROLANDO E. ESTRELLA,
FERNANDO DIAZ,
JUAN E. FELIX-FERNANDEZ,
EMILIO J. FRIAS-REYES,
ERICKSON M. VENTURA-
MARTINEZ,
ROBERT L. DIAZ-MENDEZ,
HIANCARLOS MOSQUEA-
RAMOS,
BRYANT POLANCO,
JONATHAN A. PIMENTEL,

Defendants.

Cr. No. 19-142-JJM

In violation of 18 U.S.C. § 1349

18 U.S.C. § 1344

18 U.S.C. § 1028A

18 U.S.C. § 2

SEALED

SUPERSEDING INDICTMENT

The Grand Jury charges that:

INTRODUCTION

1. At all times relevant to this Indictment, TD Bank, headquartered in Cherry Hill, New Jersey, Bank of America, headquartered in Charlotte, North Carolina, KeyBank, headquartered in Cleveland, Ohio, Santander Bank, headquartered in Boston, Massachusetts and Enterprise Bank, headquartered in Lowell, Massachusetts were financial institutions operating in interstate and foreign commerce, whose deposits were insured by the Federal Deposit Insurance Corporation. Together these financial institutions will be referred to as victim banks.

2. TD Bank, Bank of America, KeyBank, Santander Bank and Enterprise

Bank offered its customers banking services, including savings and checking accounts and retail loans.

3. TD Bank, Bank of America, KeyBank, Santander Bank and Enterprise Bank required new customers to present a valid government identification and sign a signature card for each new account opened.

4. At all times relevant to this Indictment, Bethpage Federal Credit Union, headquartered in Bethpage, New York, Alliant Credit Union, headquartered in Chicago, Illinois, Pentagon Federal Credit Union, headquartered in Alexandria, Virginia, Digital Federal Credit Union, headquartered in Marlborough, Massachusetts, Direct Federal Credit Union, headquartered in Needham, Massachusetts, Metro Federal Credit Union, headquartered in Chelsea, Massachusetts, American Eagle Financial Credit Union, headquartered in East Hartford, Connecticut, Sikorsky Credit Union, headquartered in Stratford, Connecticut, Greenwood Credit Union, headquartered in Warwick, Rhode Island, Jeanne D'Arc Credit Union, headquartered in Lowell, Massachusetts, Workers' Credit Union, headquartered in Fitchburg, Massachusetts, Webster First Credit Union, headquartered in Worcester, Massachusetts, Merrimack Valley Credit Union, headquartered in North Andover, Massachusetts, Sharon Credit Union, headquartered in Sharon, Massachusetts, Workers' Credit Union, headquartered in Fitchburg, Massachusetts, Liberty Bay Credit Union, headquartered in Braintree, Massachusetts, RTN Credit Union, headquartered in Waltham, Massachusetts and Triangle Credit Union headquartered in Nashua, New Hampshire were financial institutions operating in interstate and foreign commerce, whose deposits were insured

by the National Credit Union Administration. Together these financial institutions will be referred to as victim credit unions. Each offered their customers banking services including savings and checking accounts, credit cards and used car loans.

COUNT ONE

(Conspiracy to Commit Bank Fraud)

5. Between , June 1, 2017 and September 30, 2019, in the District of Rhode Island, and elsewhere, the Defendants ROLANDO E. ESTRELLA, FERNANDO DIAZ, JUAN E. FELIX-FERNANDEZ, EMILIO J. FRIAS-REYES, ERICKSON M. VENTURA-MARTINEZ, ROBERT L. DIAZ-MENDEZ, HIANCARLOS MOSQUEA-RAMOS, BRYANT POLANCO, and JONATHAN A. PIMENTEL, along with others known and unknown to the grand jury, did knowingly and willfully combine, conspire, confederate and agree to commit Bank Fraud, 18 U.S.C. § 1344(2).

Object of the Conspiracy

6. The object of the conspiracy was for ROLANDO E. ESTRELLA, FERNANDO DIAZ, JUAN E. FELIX-FERNANDEZ, EMILIO J. FRIAS-REYES, ERICKSON M. VENTURA-MARTINEZ, ROBERT L. DIAZ-MENDEZ, HIANCARLOS MOSQUEA-RAMOS, BRYANT POLANCO, JONATHAN A. PIMENTEL, and others to unlawfully enrich themselves by making false statements, providing counterfeit documents, including counterfeit government identifications and motor vehicle titles, to the victim banks and credit unions, to induce those institutions to provide ROLANDO E. ESTRELLA, FERNANDO DIAZ, JUAN E. FELIX-FERNANDEZ, EMILIO J. FRIAS-REYES, ERICKSON M. VENTURA-MARTINEZ, ROBERT L. DIAZ-MENDEZ,

HIANCARLOS MOSQUEA-RAMOS, BRYANT POLANCO, JONATHAN A.

PIMENTEL and others with monies, funds, credits, assets, and other property.

Manner and Means of the Conspiracy

7. The manner and means by which the co-conspirators sought to accomplish, and did accomplish the object of the conspiracy included, among others, the following:

8. It was part of the conspiracy that the co-conspirators purchased the stolen personal identification information of multiple victims, including dates of birth and Social Security numbers from internet websites accessed through the "dark web."

9. It was further part of the conspiracy that the co-conspirators used that stolen personal identification information to create counterfeit government identifications.

10. It was further part of the conspiracy that the co-conspirators identified and recruited individuals willing to pose as the identity theft victims and then make application for bank accounts and automobile loans with victim credit unions.

11. It was further part of the conspiracy that the co-conspirators created counterfeit automobile vehicle titles for submission to the victim credit unions to induce them to approve the fraudulent used car loan applications.

12. It was further part of the conspiracy that the co-conspirators created shell used car businesses to represent to victim credit unions as the "sellers" of the automobiles identified as collateral for the used car loans and to manufacture false bills of sale identifying the shell companies as the seller.

13. It was further part of the conspiracy that the co-conspirators identified and recruited individuals to open bank accounts in the shell companies' name for the purpose of depositing the loan checks made payable to the companies and to then withdraw cash from those accounts.

14. It was further part of the conspiracy that conspirators at times used their true identity to submit false used car loan applications to the victim credit unions to induce them to approve loans.

15. It was further part of the conspiracy that the conspirators created false and counterfeit wage earning statements and motor vehicle bills of sale.

Acts in Furtherance of the Conspiracy
Bethpage Federal Credit Union

16. On June 15, 2017, ROLANDO E. ESTRELLA, along with Octavio Andres Difo-Castro, Angel Morales, and Jeffrey Rodriguez, previously indicted for this conduct, caused an online application, using the stolen personal identification information of Mario G. Lima, a date of birth of XX/XX/1969 and a Social Security Number of XXX-XX-3682 to be made for membership with the Bethpage Federal Credit Union including checking and savings privileges.

17. On or about June 15, 2017, ROLANDO E. ESTRELLA along with Octavio Andres Difo-Castro previously indicted for this conduct, caused an online application, using the stolen personal identification information of Mario G. Lima, a date of birth of XX/XX/1969 and a Social Security Number of XXX-XX-3682 to be made for a used car loan to purchase a Ford 150 pickup truck with Bethpage Federal Credit Union falsely

representing the seller of the motor vehicle to be Patricia A. Peralta. The application for the loan was approved and a check was disbursed.

18. On July 3, 2017, ROLANDO E. ESTRELLA, along with Octavio Andres Difo-Castro, previously indicted for this conduct, caused an online application, using the stolen personal identification information of Robert Rocchio, a date of birth of XX/XX/1976 and a Social Security Number of XXX-XX-6685 to be made for membership with the Bethpage Federal Credit Union including checking and savings privileges.

19. On or about July 5, 2017, ROLANDO E. ESTRELLA, along with Octavio Andres Difo-Castro, previously indicted for this conduct, caused an online application to be made using the stolen personal identification information of Robert Rocchio including a date of birth of XX/XX/1976 and a Social Security Number of XXX-XX-6685 for a used car loan with Bethpage Federal Credit Union purportedly to purchase of a 2015 Chevrolet Corvette, falsely representing the seller of the car to be Olban Vega. The application for the loan was approved and a check was disbursed.

20. On or about July 18, 2017, ROLANDO E. ESTRELLA, along with Octavio Andres Difo-Castro, previously indicted for this conduct, caused an online application using the stolen personal identification information of Manuel T. Correia, including a date of birth of XX/XX/1978 and a Social Security Number of XXX-XX-7879 to be made for membership with the Bethpage Federal Credit Union including checking and savings privileges.

21. On or about July 20, 2017, ROLANDO E. ESTRELLA, along with Octavio

Andres Difo-Castro, previously indicted for this conduct, caused an online used automobile loan application to be made with the Bethpage Federal Credit Union using the stolen personal identification information of Manuel T. Correia, a date of birth of XX/XX/1978 and a Social Security Number of XXX-XX-7879 purportedly for the purchase of a 2015 Cadillac Escalade, falsely identifying the seller of the vehicle as Felix J. Diaz. The application for the loan was approved and a check was disbursed.

22. On or about July 20, 2017, ROLANDO E. ESTRELLA, along with Octavio Andres Difo-Castro, previously indicted for this conduct, caused a facsimile to be sent from Rhode Island to Bethpage Federal Credit Union that included a copy of a counterfeit United States Passport in the name of Manuel T. Correia along with a counterfeit Rhode Island Motor Vehicle Title for a 2015 Cadillac automobile falsely representing the vehicle as owned by Felix J. Diaz.

Alliant Credit Union

23. On or about June 30, 2017, ROLANDO E. ESTRELLA, along with Octavio Andres Difo-Castro, previously indicted for this conduct, caused an online application using the stolen personal identification information of Robert Rocchio, including a date of birth of XX/XX/1976 and a Social Security Number of XXX-XX-6685 to be made for membership with the Alliant Credit Union including checking and savings privileges.

24. On or about July 15, 2017, ROLANDO E. ESTRELLA, along with Octavio Andres Difo-Castro, previously indicted for this conduct, caused an online used car loan application to be filed with Alliant Credit Union using the stolen personal identification information of Robert Rocchio, a date of birth of XX/XX/1976 and a

Social Security Number of XXX-XX-6685 purportedly for the purchase of a 2015 Chevrolet Corvette, falsely identifying the seller of the vehicle as Juan Ruiz. The application for the loan was approved and a check was disbursed.

25. On or about July 15, 2017, ROLANDO E. ESTRELLA, along with Octavio Andres Difo-Castro, previously indicted for this conduct, caused a facsimile to be sent from Rhode Island to Alliant Credit Union that included a copy of a counterfeit Rhode Island driver's license in the name Robert Rocchio along with a counterfeit Rhode Island Motor Vehicle Title for a 2015 Chevrolet automobile, falsely representing the vehicle as owned by Juan Ruiz. Alliant Credit Union approved the loan and disbursed a \$55,000 check payable to Juan Ruiz.

26. On or about August 11, 2017, ROLANDO E. ESTRELLA, along with Octavio Andres Difo-Castro, previously indicted for this conduct, caused an online application using the stolen personal identification information of Hector R. Rosales, including a date of birth of XX/XX/1969 and a Social Security Number of XXX-XX-5103 to be made for membership with the Alliant Credit Union including checking and savings privileges.

27. On or about August 16, 2017, ROLANDO E. ESTRELLA, along with Octavio Andres Difo-Castro, previously indicted for this conduct, caused an online loan application to be filed with Alliant Credit Union using the stolen personal identification information of Hector R. Rosales, a date of birth of XX/XX/1969 and a Social Security Number of XXX-XX-5103 purportedly for the purchase of a 2013 Cadillac Escalade. Alliant approved the loan and disbursed a \$35,000 check.

Pentagon Federal Credit Union

28. On or about June 14, 2017, ROLANDO E. ESTRELLA, along with Octavio Andres Difo-Castro, previously indicted for this conduct, caused an online application using the stolen personal identification information of Mario G. Lima, including a date of birth of XX/XX/1969 and a Social Security Number of XXX-XX-3682 to be made for membership with the Pentagon Federal Credit Union including checking and savings privileges.

29. On or about June 30, 2017, ROLANDO E. ESTRELLA, along with Octavio Andres Difo-Castro, previously indicted for this conduct, caused an online application using the stolen personal identification information of Mario G. Lima, including a date of birth of XX/XX/1969 and a Social Security Number of XXX-XX-3682 to be made for a used car loan to purchase a Ford 150 pickup truck with the Pentagon Federal Credit Union falsely identifying the seller of the vehicle as Nilka Reyes.

30. On or about December 13, 2017, ROLANDO E. ESTRELLA, along with Octavio Andres Difo-Castro, previously indicted for this conduct, caused an online application using the stolen personal identification information of Luis Roque, including a date of birth of XX/XX/1971 and a Social Security Number of XXX-XX-0912 to be made for membership with the Pentagon Federal Credit Union including checking and savings privileges.

31. On or about December 13, 2017, ROLANDO E. ESTRELLA, along with Octavio Andres Difo-Castro, previously indicted for this conduct, caused an online application using the stolen personal identification information of Luis Roque,

including a date of birth of XX/XX/1971 and a Social Security Number of XXX-XX-0912 to be made for a used car loan to purchase what was represented to be a 2015 Lincoln Navigator, with the Pentagon Federal Credit Union falsely identifying the seller of the vehicle as Alejandro Regalado.

32. On or about March 12, 2018, ROLANDO E. ESTRELLA, along with Octavio Andres Difo-Castro, previously indicted for this conduct, caused an online application using the stolen personal identification information of Stefan P. Dodd, including a date of birth of XX/XX/1971 and a Social Security Number of XXX-XX-3503 to be made for membership with the Pentagon Federal Credit Union including checking and savings privileges.

33. On or about March 12, 2018, ROLANDO E. ESTRELLA, along with Octavio Andres Difo-Castro, previously indicted for this conduct, caused an online application using the stolen personal identification information of Stefan P. Dodd, including a date of birth of XX/XX/1971 and a Social Security Number of XXX-XX-3503 to be made for a used car loan to purchase a 2015 Infinity with the Pentagon Federal Credit Union.

34. On or about July 11, 2018, ROLANDO E. ESTRELLA, along with Octavio Andres Difo-Castro, previously indicted for this conduct, caused an online application using the stolen identification information of Randall G. Gerber, including a date of birth of XX/XX/1950 and a Social Security Number of XXX-XX- 8878 to be made for membership with the Pentagon Federal Credit Union including checking and savings privileges.

35. On or about July 11, 2018, ROLANDO E. ESTRELLA, along with Octavio Andres Difo-Castro, previously indicted for this conduct, caused an online application using the stolen identification information of Randall G. Gerber, including a date of birth of XX/XX/1950 and a Social Security Number of XXX-XX-8878 to be made for a used car loan to purchase a 2013 Mercedes Benz Roadster, with the Pentagon Federal Credit Union, falsely representing the seller as Quelin Rosario.

Digital Federal Credit Union

36. On or about February 27, 2018, ROLANDO E. ESTRELLA, along with Octavio Andres Difo-Castro, previously indicted for this conduct, caused an online application using the stolen personal identification information of Edward L. Delacruz, including a date of birth of XX/XX/1971 and a Social Security Number of XXX-XX- 0060 to be made for membership with the Digital Federal Credit Union including checking and savings privileges.

37. On or about March 2, 2018, ROLANDO E. ESTRELLA, along with Octavio Andres Difo-Castro, previously indicted for this conduct, caused an online application using the stolen personal identification information of Edward L. Delacruz, including a date of birth of XX/XX/1971 and a Social Security Number of XXX-XX-0060 to be made for a used car loan to purchase a 2018 Mercedes Benz with the Digital Federal Credit Union falsely identifying the seller of the vehicle as Stefan P. Dodd.

38. On or about June 14, 2018, ROLANDO E. ESTRELLA, along with Octavio Andres Difo-Castro, previously indicted for this conduct, caused an online application using the stolen personal identification information of Harold F. Nelson, including a

date of birth of XX/XX/1972 and a Social Security Number of XXX-XX-1331 to be made for membership with the Digital Federal Credit Union including checking and savings privileges.

39. On or about October 4, 2018, ROLANDO E. ESTRELLA, JUAN E. FELIX-FERNANDEZ, and G.L., an unindicted co-conspirator, caused an online application using the true information of JUAN E. FELIX, to be made for a used car loan falsely claiming the loan was to purchase a 2018 BMW 7 series vehicle identification number WBA7E2C5XJG742432 with the Digital Federal Credit Union.

40. On or about March 3, 2019, ROLANDO E. ESTRELLA, ERICKSON M. VENTURA-MARTINEZ and others, caused an online application using the true information of ERICKSON M. VENTURA-MARTINEZ, to be made for a used car loan, falsely claiming the loan was to purchase a 2015 Ford Explorer from HIANCARLOS MOSQUEA-RAMOS with the Digital Federal Credit Union.

41. On or about May 30, 2019, ROLANDO E. ESTRELLA, ROBERT L. DIAZ-MENDEZ and others, caused an online application using the true information of ROBERT L. DIAZ-MENDEZ, to be made for a used car loan falsely claiming the loan was to purchase a 2018 Land Rover from HIANCARLOS MOSQUEA-RAMOS with Digital Federal Credit Union.

42. On or about June 21, 2019, ROLANDO E. ESTRELLA, FERNANDO DIAZ and others, caused an online application using the true information of FERNANDO DIAZ, to be made for a used car loan falsely claiming the loan was to purchase a 2016 Porsche Cayenne from BRYANT POLANCO with Digital Federal Credit Union.

Direct Federal Credit Union

43. On or about May 31, 2018, ROLANDO E. ESTRELLA, along with Octavio Andres Difo-Castro, previously indicted for this conduct, caused an online application using the stolen personal identification of Eugenio L. Barros, including a date of birth of XX/XX/1970 and a Social Security Number of XXX-XX-8886 to be made for a savings and checking account with Direct Federal Credit Union.

44. On or about May 31, 2018, ROLANDO E. ESTRELLA, along with Octavio Andres Difo-Castro, previously indicted for this conduct, caused an online application using the stolen personal identification information of Eugenio L. Barros, including a date of birth of XX/XX/1970 and a Social Security Number of XXX-XX-8886 to be made for a used car loan to purchase a 2015 Audi with the Direct Federal Credit Union falsely identifying the seller of the vehicle as Geraldo's Foreign Cars.

45. On or about June 7, 2018, ROLANDO E. ESTRELLA, along with Octavio Andres Difo-Castro, previously indicted for this conduct, caused an online application using the stolen personal identification of Nereyda Rodriguez, including a date of birth of XX/XX/1972 and a Social Security Number of XXX-XX-0521 to be made for a savings and checking account with Direct Federal Credit Union.

46. On or about June 7, 2018, ROLANDO E. ESTRELLA, along with Octavio Andres Difo-Castro, previously indicted for this conduct, caused an online application using the stolen personal identification information of Nereyda Rodriguez, including a date of birth of XX/XX/1972 and a Social Security Number of XXX-XX-0521 to be made for a used car loan to purchase a 2014 Land Rover, with the Direct Federal Credit Union

falsely identifying the seller of the vehicle as Alyson E. Martinez.

47. On or about June 13, 2018, ROLANDO E. ESTRELLA, along with Octavio Andres Difo-Castro, previously indicted for this conduct, caused an online application using the stolen personal identification of Aurelio S. Caetano, including a date of birth of XX/XX/1971 and a Social Security Number of XXX-XX-2280 to be made for a savings and checking account with Direct Federal Credit Union.

48. On or about June 13, 2018, ROLANDO E. ESTRELLA, along with Octavio Andres Difo-Castro, previously indicted for this conduct, caused an online application using the stolen personal identification information of Aurelio S. Caetano, including a date of birth of XX/XX/1971 and a Social Security Number of XXX-XX-2280 to be made for a used car loan to purchase a 2018 Mazda CX-9, with the Direct Federal Credit Union falsely identifying the seller of the vehicle as Geraldo's Foreign Cars.

49. On or about June 17, 2018, ROLANDO E. ESTRELLA, along with Octavio Andres Difo-Castro, previously indicted for this conduct, caused an online application using the stolen personal identification of Sergio A. Aragao, including a date of birth of XX/XX/1977 and a Social Security Number of XXX-XX-3084 to be made for a savings and checking account with the Direct Federal Credit Union.

50. On or about June 17, 2018, ROLANDO E. ESTRELLA, along with Octavio Andres Difo-Castro, previously indicted for this conduct, caused an online application using the stolen personal identification information of Sergio A. Aragao, including a date of birth of XX/XX/1977 and a Social Security Number of XXX-XX-3084 to be made for a used car loan to purchase a 2015 Dodge Ram pickup truck, with the Direct Federal

Credit Union falsely identifying the seller of the vehicle being Geraldo's Foreign Cars.

51. On or about June 17, 2018, ROLANDO E. ESTRELLA, along with Octavio Andres Difo-Castro, previously indicted for this conduct, caused an online application using the stolen personal identification of Jennifer Alley, including a date of birth of XX/XX/1974 and a Social Security Number of XXX-XX-2492 to be made for a savings and checking account with the Direct Federal Credit Union.

52. On or about June 17, 2018, ROLANDO E. ESTRELLA, along with Octavio Andres Difo-Castro, previously indicted for this conduct, caused an online application using the stolen personal identification information of Jennifer Alley, including a date of birth of XX/XX/1977 and a Social Security Number of XXX-XX-2492 to be made for a used car loan to purchase a 2016 Chevrolet Suburban, with the Direct Federal Credit Union falsely identifying the seller of the vehicle as Pamela Daylor.

53. On or about July 3, 2018, ROLANDO E. ESTRELLA, along with Octavio Andres Difo-Castro, previously indicted for this conduct, caused an online application using the stolen personal identification of Randall G. Gerber, including a date of birth of XX/XX/1950 and a Social Security Number of XXX-XX-8878 to be made for a savings and checking account with the Direct Federal Credit Union.

54. On or about July 3, 2018, ROLANDO E. ESTRELLA, along with Octavio Andres Difo-Castro, previously indicted for this conduct, caused an online application using the stolen personal identification information of Randall G. Gerber, including a date of birth of XX/XX/1950 and a Social Security Number of XXX-XX-8878 to be made for a used car loan to purchase a 2018 Audi with the Direct Federal Credit Union falsely

identifying the seller of the vehicle as Quelin Rosario.

55. On or about May 28, 2019, ROLANDO ESTRELLA, along with EMILIO J. FRIAS-REYES and others, caused an online application to be filed using the true identity of EMILIO J. FRIAS-REYES, for a used car loan falsely claiming the loan was to purchase a 2018 BMW 7 series with the Direct Federal Credit Union.

56. On or about May 30, 2019, ROLANDO E. ESTRELLA, along with ROBERT L. DIAZ-MENDEZ and others, caused an online application to be filed using the true identity of ROBERT L. DIAZ-MENDEZ, for a used car loan falsely claiming the loan was to purchase a 2018 Land Rover from HIANCARLOS MOSQUEA-RAMOS with the Direct Federal Credit Union.

American Eagle Finance Credit Union

57. On or about October 4, 2018, ROLANDO E. ESTRELLA, JUAN E. FELIX-FERNANDEZ, and G.L., an unindicted coconspirator whose identity is known to the grand jury, caused a used car loan application to be filed using the true identity of JUAN E. FELIX-FERNANDEZ, falsely claiming the loan was to purchase a 2018 BMW 7 series vehicle with the American Eagle Finance Credit Union.

Sikorsky Credit Union

58. On or about October 5, 2018, ROLANDO E. ESTRELLA, JUAN E. FELIX-FERNANDEZ, and G.L. an unindicted coconspirator whose identity is known to the grand jury, caused an application to be filed using the true identity of JUAN E. FELIX-FERNANDEZ, falsely claiming the loan was to purchase a 2018 BMW 7 series vehicle with the Sikorsky Credit Union,

Greenwood Credit Union

59. On or about October 9, 2018, ROLANDO E. ESTRELLA, JUAN E. FELIX-FERNANDEZ, and G.L. an unindicted coconspirator whose identity is known to the grand jury, caused an application to be filed using the true identity of JUAN E. FELIX-FERNANDEZ, falsely claiming the loan was to purchase a 2018 BMW 7 series vehicle with the with the Greenwood Credit Union.

Jeanne D'Arc Credit Union

60. On or about May 31, 2019, ROLANDO E. ESTRELLA, and EMILIO J. FRIAS-REYES caused an application to be filed using the true identity of EMILIO J. FRIAS-REYES for a used car loan falsely claiming the loan was to purchase a 2018 BMW 7 series vehicle with the with the Jeanne D'Arc Credit Union.

Merrimack Valley Credit Union

61. On or about March 5, 2019, ROLANDO E. ESTRELLA and ERICKSON M. VENTURA-MARTINEZ, caused an online application to be filed using the true identity of ERICKSON M. VENTURA-MARTINEZ for a used car loan falsely claiming the loan was to purchase a 2011 Infiniti from Z.V.

62. On or about May 28, 2019, ROLANDO E. ESTRELLA and EMILIO J. FRIAS-REYES caused an application to be filed using the true identity of EMILIO J. FRIAS-REYES for a used car loan falsely claiming the loan was to purchase what was represented to be a 2018 BMW 7 series vehicle with the with the Merrimack Valley Credit Union.

63. On or about May 30, 2019, ROLANDO E. ESTRELLA and ROBERT L.

DIAZ-MENDEZ and others caused an application to be filed using the true identity of ROBERT L. DIAZ-MENDEZ for a used car loan falsely claiming the loan was to purchase a 2018 Land Rover vehicle from HIANCAROLOS MOSQUEA-RAMOS with the Merrimack Valley Credit Union.

64. On or about June 25, 2019, ROLANDO E. ESTRELLA and FERNANDO DIAZ caused an application to be filed using the true identity of FERNANDO DIAZ for a used car loan falsely claiming the loan was to purchase A 2016 Porsche Cayenne vehicle from BRYANT POLANCO with the Merrimack Valley Credit Union.

65. On or about July 2, 2019, ROLANDO E. ESTRELLA and HIANCARLOS MOSQUEA-RAMOS, caused an application to be filed using the true identity of HIANCARLOS MOSQUEA-RAMOS for a used car loan falsely claiming the loan was to purchase a 2016 BMW X5 vehicle from JONATHAN A. PIMENTEL with the Merrimack Valley Credit Union.

Workers' Credit Union

66. On or about May 28, 2019, ROLANDO E. ESTRELLA and EMILO J. FRIAS-REYES caused an application to be filed using the true identity of EMILIO J. FRIAS-REYES for a used car loan falsely claiming the loan was to purchase a 2018 BMW 7 series vehicle with the with the Workers' Credit Union.

67. On or about May 30, 2019, ROLANDO E. ESTRELLA and ROBERT L. DIAZ-MENDEZ, caused an application to be filed using the true identity of ROBERT L. DIAZ-MENDEZ for a used car loan falsely claiming the loan was to purchase a 2018 Land Rover vehicle from HIANCARLOS MOSQUEA-RAMOS with Workers' Credit

Union.

Metro Credit Union

68. On or about March 3, 2019, ROLANDO E. ESTRELLA and ERICKSON M. VENTURA-MARTINEZ, caused an application to be filed using the true identity of ERICKSON M. VENTURA-MARTINEZ for a used car loan falsely claiming the loan was to purchase a 2015 Ford Explorer vehicle from HIANCARLOS MOSQUEA-RAMOS with Metro Credit Union.

69. On or about June 3, 2019, ROLANDO E. ESTRELLA and EMILIO J. FRIAS-REYES caused an application to be filed using the true identity of EMILIO J. FRIAS-REYES for a used car loan falsely claiming the loan was to purchase what was represented to be a 2018 BMW 7 series vehicle with the with the Metro Credit Union.

Webster First Credit Union

70. On or about May 28, 2019, ROLANDO E. ESTRELLA and EMILIO J. FRIAS-REYES caused an application to be filed using the true identity of EMILIO J. FRIAS-REYES for a used car loan falsely claiming the loan was to purchase a 2018 BMW 7 series vehicle with the Webster First Credit Union.

Sharon Credit Union

71. On or about March 6, 2019, ROLANDO E. ESTRELLA and ERICKSON M. VENTURA-MARTINEZ, caused an application to be filed using the true identity of ERICKSON M. VENTURA-MARTINEZ, for a used car loan falsely claiming the loan was to purchase a 2015 Ford Explorer vehicle from HIANCARLOS MOSQUEA-RAMOS with the Sharon Credit Union.

72. On or about May 30, 2019, ROLANDO E. ESTRELLA and ROBERT L. DIAZ-MENDEZ, caused an application to be filed using the true identity of ROBERT L. DIAZ-MENDEZ, for a used car loan falsely claiming the loan was to purchase 2018 Land Rover from HIANCARLOS MOSQUEA-RAMOS with Sharon Credit Union.

73. On or about July 2, 2019, ROLANDO E. ESTRELLA and FERNANDO DIAZ, caused an application to be filed using the true identity of FERNANDO DIAZ, for a used car loan falsely claiming the loan was to purchase a 2016 Porsche Cayenne vehicle with the Sharon Credit Union.

Triangle Credit Union

74. On or about June 24, 2019, ROLANDO E. ESTRELLA and FERNANDO DIAZ, caused an application to be filed using the true identity of FERNANDO DIAZ, for a used car loan falsely claiming the loan was to purchase a 2016 Porsche Cayenne from BRYANT POLANCO with the Triangle Credit Union.

Liberty Bay Credit Union

75. On or about March 20, 2019, ROLANDO E. ESTRELLA and ERICKSON M. VENTURA-MARTINEZ caused an application to be filed using the true identity of ERICKSON M. VENTURA-MARTINEZ, for a used car loan falsely claiming the loan was to purchase a 2015 Ford Explorer vehicle from Z.V. with Liberty Bay Credit Union.

RTN Credit Union

76. On or about May 30, 2019, ROLANDO E. ESTRELLA and ROBERT L. DIAZ-MENDEZ caused an application to be filed using the true identity of ROBERT L. DIAZ-MENDEZ for a used car loan falsely claiming the loan was to purchase a 2018

Land Rover from HIANCARLOS MOSQUEA-RAMOS with RTN Credit Union.

TD Bank

77. Between June 15, 2017 and June 19, 2019, ROLANDO E. ESTRELLA, FERNANDO DIAZ, BRYANT POLANCO, ERICKSON M. VENTURA-MARTINEZ, HIANCAROLOS MOSQUEA-RAMOS, Patricia A. Peralta, Angel Morales, Jeffry Rodriguez, and Octavio Andres Difo-Castro, previously indicted for this conduct, opened checking and savings accounts with TD bank at branches located in Rhode Island, Massachusetts and elsewhere, using both stolen and genuine identifications for the purpose of depositing fraudulently obtained used car loan checks.

78. Between June 15, 2017 and June 19, 2019, ROLANDO E. ESTRELLA, FERNANDO DIAZ, BRYANT POLANCO, ERICKSON M. VENTURA-MARTINEZ, HIANCAROLOS MOSQUEA-RAMOS, Patricia A. Peralta, Angel Morales, Jeffry Rodriguez, and Octavio Andres Difo-Castro, previously indicted for this conduct, and others, withdrew cash from the various TD Bank accounts they opened.

KeyBank

79. Between April 2, 2018 and July 24, 2018, ROLANDO E. ESTRELLA, along with Octavio Andres Difo-Castro, Yenisia Pujols, Yafira Rodriguez, previously indicted for this conduct, G.L., whose identity is known to the grand jury, and others opened checking and savings accounts at KeyBank located in Hartford, Connecticut using stolen identifications for the purpose of depositing fraudulently obtained used car loan checks.

80. Between April 2, 2018 and July 24, 2018, ROLANDO E. ESTRELLA, along

with Octavio Andres Difo-Castro, Yenisia Pujols, Yafira Rodriguez, previously indicted for this conduct, G.L., whose identity is known to the grand jury, and others caused fraudulently obtained used car loan checks to be deposited into the various KeyBank accounts they had opened.

81. Between April 2, 2018 and July 24, 2018, ROLANDO E. ESTRELLA, along with Octavio Andres Difo-Castro, Yenisia Pujols, Yafira Rodriguez, previously indicted for this conduct, and G.L., whose identity is known to the grand jury, withdrew cash from the accounts into which the fraudulently obtained loan checks had been deposited.

Bank of America

82. Between May 10, 2018 and August 7, 2019, ROLANDO E. ESTRELLA, FERNANDO DIAZ, BRYANT POLANCO, along with Octavio Andres Difo-Castro, and Angel Morales previously indicted for this conduct, opened checking and savings accounts at Bank of America in New York and Massachusetts using stolen and genuine identifications for the purpose of depositing fraudulently obtained used car loan checks.

83. Between May 10, 2018 and August 31, 2019, ROLANDO E. ESTRELLA, FERNANDO DIAZ, BRYANT POLANCO, along with Octavio Andres Difo-Castro, Angel Morales, previously indicted for this conduct, and others, caused fraudulently obtained used car loan checks to be deposited into the various Bank of America accounts they had opened.

84. Between May 10, 2018 and August 31, 2019, ROLANDO E. ESTRELLA, FERNANDO DIAZ, BRYANT POLANCO, along with Octavio Andres Difo-Castro, Angel Morales, previously indicted for this conduct, and others withdrew cash from the

various involved Bank of America accounts.

Enterprise Bank

85. On or about July 29, 2019, ROLANDO E. ESTRELLA, JONATHAN A. PIMENTEL, HIANCAROLOS MOSQUEA-RAMOS opened checking and savings accounts at Enterprise Bank in Methuen, Massachusetts for the purpose of depositing fraudulently obtained loan checks.

86. Between July 29, 2019 and August 30, 2019, ROLANDO E. ESTRELLA, JONATHAN A. PIMENTEL, and HIANCARLOS MOSQUEA-RAMOS, withdrew cash from the Enterprise Account.

All in violation of 18 U.S.C. § 1349

COUNTS II-VIII
(Bank Fraud)

Scheme to Defraud

87. Paragraphs 1-86 of COUNT I of this indictment are re-alleged and incorporated by reference as though fully set forth herein.

88. Between June 1, 2017 and September 30, 2019, in the District of Rhode Island and elsewhere, the defendant ROLANDO E. ESTRELLA , Octavio Andres Difo-Castro along with others known and unknown, did knowingly devise a scheme and artifice to defraud Bethpage Federal Credit Union, Alliant Credit Union, Pentagon Federal Credit Union, Digital Federal Credit Union, Direct Federal Credit Union, Metro Credit Union, Jeanne D'Arc Credit Union, Merrimack Valley Credit Union, Workers' Credit Union, Webster First Credit Union, American Eagle Finance Credit Union,

Sikorsky Credit Union, Triangle Credit Union, Metro Credit Union, Sharon Credit Union, Liberty Bay Credit Union, RTN Credit Union and Greenwood Credit Union all federally insured financial institutions, and to obtain monies, funds, credits, assets, securities and other property from said financial institutions by means of false and fraudulent pretenses, representation, and promises.

89. Such scheme included using stolen personal identification information of others to open checking accounts with TD Bank, KeyBank, Bank of America, and Enterprise Bank, for the purpose of depositing used car loan checks that were fraudulently obtained from Bethpage Federal Credit Union, Alliant Credit Union, Pentagon Federal Credit Union, Digital Federal Credit Union, Direct Federal Credit Union, Metro Credit Union, Jeanne D'Arc Credit Union, Merrimack Valley Credit Union, Workers' Credit Union, Webster First Credit Union, American Eagle Finance Credit Union, Sikorsky Credit Union, Triangle Credit Union, Metro Credit Union, Sharon Credit Union, Liberty Bay Credit Union, RTN Credit Union and Greenwood Credit Union and to thereafter withdraw United States currency from those accounts.

90. It was further part of the scheme to create counterfeit automobile titles, bills of sale, and employee earning statements and to furnish these documents to the victim credit unions to induce the credit unions into approving of the loans.

Execution of the Scheme

91. Paragraphs 1-86 of COUNT I of this indictment are re-alleged and incorporated by reference as though fully set forth herein.

<u>Count</u>	<u>Date</u>	<u>Defendant</u>	<u>Financial Institution</u>	<u>Means of Executing Scheme to Defraud</u>
II	June 19, 2017	Rolando E. Estrella	TD Bank	Deposited or caused to be deposited, a fraudulently obtained check number 22420116 drawn on the Bethpage Federal Credit Union payable to Patricia A. Peralta.
III	July 10, 2017	Rolando E. Estrella	TD Bank	Deposited or caused to be deposited, a fraudulently obtained check number 0003155750 drawn on the Pentagon Federal Credit Union payable to Nilka D. Reyes and Mario G. Lima.
IV	July 13, 2017	Rolando E. Estrella	TD Bank	Deposited or caused to be deposited, a fraudulently obtained check number 22429656 drawn on the Bethpage Federal Credit Union payable to Olban Vega.
V	July 18, 2017	Rolando E. Estrella	TD Bank	Deposited or caused to be deposited, a fraudulently obtained check number 22433391 drawn on the Bethpage Federal Credit Union payable to Juan Ruiz
VI	July 18, 2017	Rolando E. Estrella	TD Bank	Deposited or caused to be deposited, a fraudulently obtained check number 000001493033 drawn on the Alliant Credit Union payable to Juan Ruiz
VII	August 8, 2017	Rolando E. Estrella	TD Bank	Deposited or caused to be deposited, a fraudulently obtained check number 22437861 drawn on the Bethpage Federal Credit Union payable to Francisco B. Vazquez
VIII	December 18, 2017	Rolando E. Estrella	TD Bank	Deposited or caused to be deposited, a fraudulently obtained check number 0003197216 drawn on the

				Pentagon Federal Credit Union payable to Alejandro Regalado and Luis Roque
--	--	--	--	--

All in violation of 18 U.S. C. § § 1344(2) and 2

COUNT IX
(Aggravated Identity Theft)

92. On or about July 7, 2017, in the District of Rhode Island and elsewhere, the defendant, ROLANDO E. ESTRELLA, along with Jeffry Rodriguez, who was previously charged for this conduct, during and in relation to the commission of bank fraud, in violation of 18 U.S.C. § 1344(2), did knowingly possess and use without lawful authority, a means of identification of another person, that is the name, date of birth and Social Security number of Juan Ruiz.

COUNT X
(Fraudulent Use of a Social Security Number)

93. On or about July 7, 2017, in the District of Rhode Island and elsewhere, the defendant, ROLANDO E. ESTRELLA, along with Jeffry Rodriguez, who was previously charged for this conduct, with the intent to deceive TD Bank falsely represented to TD Bank that Social Security Number XXX-XX-1109, a true Social Security Number assigned by the Social Security Administration to Juan Ruiz, was Rodriguez's.

All in violation of 42 U.S.C. § 408(a)(7)(B) and 18 U.S.C. § 2.

AARON L. WEISMAN
United States Attorney



William J Ferland
William J Ferland
Assistant U.S. Attorney

Richard B. Myrus
Richard B. Myrus
First Assistant U.S. Attorney

Date: 6 July 2020